

Lincoln Davis Wilson  
Timothy A. Garrison (*pro hac vice* pending)  
Gabriella McIntyre (*pro hac vice* pending)  
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*Counsel for Plaintiff*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
TRENTON VICINAGE**

**FIRST CHOICE WOMEN'S  
RESOURCE CENTERS, INC.**

*Plaintiff,*

v.

**MATTHEW PLATKIN**, in his  
official capacity as Attorney General  
for the State of New Jersey,

*Defendant.*

**Civil No. 3:23-cv-23076-MAS-TJB**

**NOTICE OF EMERGENCY  
MOTION FOR TEMPORARY  
RESTRAINING ORDER AND  
MOTION FOR PRELIMINARY  
INJUNCTION**

**Oral Argument Requested**

PLEASE TAKE NOTICE that Plaintiff First Choice Women's Resource Centers, Inc., by and through its undersigned attorney, hereby moves (1) for a preliminary injunction prohibiting Defendant Matthew Platkin from enforcing the Subpoena served upon Plaintiff, response due **today, December 15, 2023**; and (2) for an emergency temporary restraining order pursuant to Federal Rule of Civil Procedure 65 and Local Rule 65.1 prohibiting enforcement of same pending the resolution of Plaintiff's motion for preliminary injunction. In support of the motion, Plaintiff submits the Verified Complaint in this action (Dkt. 1) and its brief in support of motion for temporary restraining order and preliminary injunction (Dkt. 6). Plaintiff submits the attached proposed order to show cause granting a temporary restraining order (separately docketed at Dkt. 5).

WHEREFORE Plaintiff respectfully submits that the Court should (1) grant its motion for preliminary injunction prohibiting enforcement of the Subpoena and (2) grant its emergency motion for a temporary restraining order prohibiting enforcement of same pending determination of the preliminary injunction motion.

Dated: December 15, 2023

Respectfully submitted,

/s/ Lincoln Davis Wilson

Lincoln Davis Wilson

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*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on December 15, 2023, I served a true and correct copy of the foregoing on Defendant via email at the following address:

[NJAG.ElectronicService.CivilMatters@law.njoag.gov](mailto:NJAG.ElectronicService.CivilMatters@law.njoag.gov)

/s/ Lincoln Davis Wilson  
Lincoln Davis Wilson